

ORIGINALIN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BRETT T. CULVER

Plaintiff,

v.

JOHN DOE (presumably
SCI Mahanoy Property Office personnel),
et al.,

Defendants.

**FILED
HARRISBURG**

OCT 25 2001

MARY E. D'ANDREA, CLERK (Judge Kane)
~~FOR~~ ~~DEPUTY CLERK~~PLAINTIFF'S
FIRST SET OF
INTERROGATORIESCase No. 1:01-cv-00904

In accordance with Rule 33 of the Federal Rules of Civil Procedure, Plaintiff requests that Defendant John Doe answer the following interrogatories separately and fully in writing under oath, and that the answers be signed by the person making them and be served on plaintiff within 45 days of service hereof.

In responding to these interrogatories, furnish all information which is available to you, including information in the possession of your attorneys or investigators for your attorneys, and not merely information known of your own personal knowledge.

If you cannot answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state, and answer to the extent possible, specifying your inability to answer the remainder, and stating whatever information or knowledge you have concerning the unanswered portions.

These interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes.

1. Produce all record and documentations of any and all property inventories of plaintiff's personal property since his arrival at the SCI Mahanoy facility to present.
2. Produce all record and documentation of any seized items taken from plaintiff by SCI Mahanoy staff since plaintiff's placement at the SCI Mahanoy facility to present, including any documentation of confiscations, seizures, or any official handling of personal property items belonging to plaintiff.
3. Produce a complete record of the plaintiff's property file 12-01-99 to present.
4. Cite names and badge numbers of any staff members who handled and/or received confiscated items DC-154A No. A 150818, including name of staff member receiving, date and time received, and name of person the items were received from at that

(26)
10/26

5. Cite names and badge numbers of any other handlers or recipients of items DC-154A No. A 150818, time and dates each person handled or received the items, and location(s) items DC-154A No. A 150818 were taken and/or placed for storage.
6. Cite all names and badge numbers of any individuals who viewed seized items DC-154A No. A 150818, and any individuals knowledgeable of those items, including the time and dates of items being viewed by any and all staff members who viewed said items confiscated from plaintiff.
7. Explain why plaintiff's confiscated property DC-154A No. A 150818 was not returned to his person, and by who's authority said items are presently being held.
8. Cite location and whereabouts of confiscated items DC-154A No. A 150818, including the name and badge number of person(s) in charge or responsible for the items confiscated.
9. Produce record and documentation of items seized/confiscated from plaintiff by SCI Mahanoy staff on the dates 9-14-00, 12-07-00, and 12-19-00, including the whereabouts or location of any and all items seized/confiscated on those dates.
10. Explain why plaintiff's confiscated property (9-14-00, 12-07-00 and 12-19-00) was not returned to his person, and by who's authority said items are presently being held.
11. Do you, any other employees, your attorneys have any knowledge of any item mentioned there being altered in any manner, copied, lost, or destroyed?
12. If yes,
 - (a) Explain;
 - (b) Cite instances, items, dates;
 - (c) Cite names and addresses of persons involved or who have knowledge of relevant events.

Dated, 10-23-01

by, Brett T. Carlson

PROOF OF SERVICE

I, the undersigned, hereby aver that I have served the foregoing; "Plaintiff's First Set of Interrogatories" to be served upon the defendants of Complaint, Case No. 1:01-cv-00904. The Interrogatories have been submitted to the U.S. District Court (Clerk of Courts), to record date and service upon the defendant; John Doe (presumably SCI Mahanoy Property Office personnel), in Case No. 1:01-cv-00904. Plaintiff now submits to the Clerk of Courts the Interrogatories in the manner indicated:

SERVED BY U.S. MAIL ADDRESSED AS FOLLOWS:

- (2) Copies (John Doe, presumably SCI Mahanoy Property Office personnel), one to be served upon defendant, and one for the Court record.

TO: U.S. DISTRICT COURT
CLERK OF COURTS
228 WALNUT STREET
P.O. BOX 983
HARRISBURG, PA. 17108

Served this 23 day of October, 2001

Signature, Brett T. Allen